

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Telephone Number Portability)	WCB Docket No. 95-116
)	
Petition of TeleGuam Holdings, LLC)	
to Extend the Date for Implementation)	
of Wireless-to-Wireless Local Number)	
Portability on Guam)	
)	

**PETITION OF TELEGUAM HOLDINGS, LLC TO EXTEND THE DATE
FOR IMPLEMENTATION OF WIRELESS-TO-WIRELESS LNP ON GUAM**

TeleGuam Holdings, LLC, dba GTA Telecom (“GTA Telecom”) and GTA Wireless (“GTA Wireless”), hereby petitions the Chief of the Wireline Competition Bureau pursuant to Rule §52.23(e) on behalf of GTA Telecom to extend the date for implementation of wireless-to-wireless Local Number Portability (“LNP”) on Guam from September 15, 2005, to December 15, 2005.¹ It also hereby petitions the Chief of the Wireless Telecommunications Bureau pursuant to Rule 52.31(d) on behalf of GTA Wireless for the same extension.² In support of this petition, TeleGuam Holdings hereby states as follows.

GTA Telecom is the wireline incumbent telecom provider on Guam. Its wireless affiliate is GTA Wireless. Both companies are wholly-owned subsidiaries of TeleGuam

¹ Because GTA Telecom has not received wireline requests for LNP, and because the rules requiring inter-modal LNP were vacated for rural LECs in USTA v. FCC (No. 03-1414; decided March 11, 2005), it is not clear that GTA Telecom is presently obligated to help implement wireless-to-wireless LNP on Guam. However, given the need for clarity, and the fact that a waiver is plainly justified, GTA Telecom asks that this request be granted.

² Should the Bureau decide to grant an extension to GTA Wireless, TeleGuam Holdings respectfully asks that the waiver order make clear that the new December 15, 2005, date would apply to all CMRS providers on Guam.

Holdings, LLC, which acquired the governmentally-owned telecom provider, Guam Telephone Authority, on January 1, 2005.

GTA Wireless made a bona fide request for wireless-to-wireless LNP on March 15, 2005, thereby triggering a deadline of September 15, 2005, pursuant to Rule §52.23(b)(2)(iv). At the time GTA Wireless made the request, GTA Telecom had been informed by its equipment vendor that the necessary work could be completed in time to meet the schedule. Through no fault of GTA Telecom or any other Guam carrier, the vendor will not complete its work in time to meet the schedule (as more fully explained below). Section 251(b) of the Communications Act requires local exchange providers to provision LNP to the extent technically feasible. While the equipment vendor's failure to meet its installation commitment thus renders wireless LNP technically infeasible within the original schedule, TeleGuam Holdings is filing this waiver to formally change the schedule as matter of caution. Accordingly, TeleGuam Holdings respectfully requests that the deadline be extended to December 15, 2005, for both GTA Telecom and GTA Wireless.

(1) Facts that demonstrate why GTA Telecom and GTA Wireless are unable to meet the Commission's deployment schedule.

The following information is provided by:

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In order to deliver the SS7 and LNP capabilities needed for LNP, GTA Telecom purchased the Nortel Broadband STP (BBSTP). The BBSTP is a next-generation SS7 signaling engine, which GTA Telecom intends to use to connect interconnects and off-island

STPs to support SS7 services and wireline LNP, when implemented. GTA Telecom began the work to purchase and install the BBSTP to support GTA Telecom's SS7 capabilities in January 2005. The cut-over date was slated for May 2005. After the bona fide request was submitted by GTA Wireless in March 2005, GTA Telecom initiated discussions with Nortel to provide LNP functionality in its three DMS wireline offices, Agana, Tumon, and Dededo. The equipment vendor's original timeline was for a delivery date of May 9, 2005, a installation start date of May 10, 2005, and a completion and cut-over date of May 15, 2005.

The Nortel BBSTP is still in the process of being connected and provisioned, which is delaying LNP and SS7 implementation projects for GTA Telecom. Contributing to this delay are the following factors:

- In May 2005, Nortel was unable to remotely connect to the BBSTP to begin provisioning the equipment as a result of networking problems, and requested GTA Telecom, in late June, to reconnect the BBSTP through the existing DMS local area network, bypassing the supplied routers originally intended for connectivity. Only in early July, did Nortel engineers begin provisioning elements of the BBSTP, thereby pushing back the scheduled delivery date.
- GTA Telecom specified that particular cables were required to connect to the SS7 modems that link the various DMS offices and interconnects for SS7 services. In late May and early June, GTA Telecom requested Nortel to supply the cables. The cables have arrived only recently, and the BBSTP is now being connected and provisioned by Nortel engineers.
- After remote connectivity to the BBSTP was established, Nortel discovered several major issues with the BBSTP software, which caused an additional delay in the project.
- In mid-July, with connectivity to the BBSTP established, cables on site, and software glitches cleared, Nortel began provisioning the BBSTP, almost two months behind the original proposed schedule turnover of May 15, 2005.
- GTA Telecom is now in the process of connecting its various DMS offices to the BBSTP. This process will take approximately two weeks to complete. The interconnects will then be connected to the STP which is expected to take a couple of additional weeks to complete.

(2) A detailed explanation of the activities that GTA Telecom and GTA Wireless have undertaken to meet the implementation schedule prior to requesting an extension of time.

The original vendor delivery date was May 15, 2005. When connectivity to the BBSTP was delayed as a result of the router problem, GTA Telecom had the network re-designed to use an existing local area network to facilitate connectivity, so Nortel could begin programming the BBSTP. GTA Telecom pulled resources from other projects and dedicated them to the network re-design to incorporate the BBSTP within its existing local area network.

GTA Telecom worked with Nortel to have the cables manufactured and shipped to Guam as soon as possible. Nortel had additional resources engaged to expedite the manufacture of the cables, as well as their provisioning of the BBSTP.

GTA Telecom also changed its network connectivity design from the proposed SS7 56kbps links to Verisign, to a T1 transport. This change was to expedite connectivity with Verisign in Los Angeles, in lieu of having to take additional time to coordinate additional cross-connects, interfaces, etc.

(3) Identification of the particular switches for which the extension is requested.

Agana Host (AGANGU01DS1)

Tumon Host (TUMNGU07DS7)

Dededo (DEDOGU03DS3)

(4) The time within which GTA Telecom and GTA Wireless will complete deployment in their affected switches.

GTA Telecom is requesting a new deadline of December 15, 2005, and will actively pursue implementation of that deadline pending action on this waiver request.

(5) A proposed schedule with milestones for meeting the deployment date.

AUG 12: GTA Telecom SS7 network connected to BBSTP.

SEP 02: Testing of SS7 and LNP completed with Verisign.

SEP 30: Interconnects connected to BBSTP network.

NOV 30: Testing completed with wireless carriers.

Based on the foregoing, TeleGuam Holdings, LLC asks that a new deadline of December 15, 2005, for wireless-to-wireless LNP on Guam be established for both GTA Telecom and GTA Wireless.

Respectfully submitted,

/s/

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July 27, 2005

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2005 I have served the foregoing pleading via electronic mail on the following persons:

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_____/s/_____
Jeanne W. Stockman

